

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

RABBI MARA NATHAN, et al., §  
§  
Plaintiffs, §  
v. §  
§ CIVIL ACTION NO. 5:25-CV-00756  
ALAMO HEIGHTS INDEPENDENT §  
SCHOOL DISTRICT, et al., §  
§  
Defendants. §

**DEFENDANT HOUSTON INDEPENDENT SCHOOL DISTRICT'S  
ANSWER TO PLAINTIFFS' COMPLAINT**

Defendant Houston Independent School District ("HISD") answers Plaintiffs' Complaint, as follows:

**ANSWER TO ALLEGATIONS**

1. The allegations in Paragraph 1 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 1 do not relate to HISD, and HISD lacks sufficient information to admit or deny them. Additionally, Senate Bill No. 10 is the best evidence of its contents.

2. The allegations in Paragraph 2 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 2 do not relate to HISD, and HISD lacks sufficient information to admit or deny them. Additionally, the legal opinion cited is the best evidence of its contents.

3. The allegations in Paragraph 3 contain legal conclusions that do not require a response. The remaining allegations in Paragraph 3 do not relate to HISD, and HISD lacks sufficient information to admit or deny them. Additionally, the legal opinion cited is the best evidence of its contents.

4. The allegations in Paragraph 4 contain legal conclusions that do not require a response.

5. The allegations in Paragraph 5 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

6. HISD admits that Plaintiffs seek the relief stated in Paragraph 6, but HISD denies that it is liable to Plaintiffs for the relief requested.

7. HISD denies that the Court has subject-matter jurisdiction over Plaintiffs' claims against HISD. Otherwise, the allegations in Paragraph 7 contain legal conclusions that do not require a response.

8. The allegations in Paragraph 8 contain legal conclusions that do not require a response.

9. The allegations in Paragraph 9 contain legal conclusions that do not require a response. To the extent that a response is required, HISD lacks sufficient information to admit or deny the allegations in Paragraph 9.

10. The allegations in Paragraph 10 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

11. The allegations in Paragraph 11 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

12. The allegations in Paragraph 12 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

13. The allegations in Paragraph 13 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

14. The allegations in Paragraph 14 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

15. The allegations in Paragraph 15 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

16. The allegations in Paragraph 16 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

17. The allegations in Paragraph 17 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

18. The allegations in Paragraph 18 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

19. The allegations in Paragraph 19 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

20. HISD currently lacks sufficient information to admit or deny the allegations in Paragraph 20.

21. HISD currently lacks sufficient information to admit or deny the allegations in Paragraph 21.

22. HISD currently lacks sufficient information to admit or deny the allegations in Paragraph 22.

23. The allegations in Paragraph 23 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

24. The allegations in Paragraph 24 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

25. The allegations in Paragraph 25 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

26. The allegations in Paragraph 26 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

27. The allegations in Paragraph 27 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

28. The allegations in Paragraph 28 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

29. The allegations in Paragraph 29 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

30. The allegations in Paragraph 30 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

31. The allegations in Paragraph 31 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

32. The allegations in Paragraph 32 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

33. HISD admits the allegations in Paragraph 33.

34. The allegations in Paragraph 34 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

35. The allegations in Paragraph 35 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

36. The allegations in Paragraph 36 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

37. HISD admits that Texas Governor Greg Abbott signed Senate Bill No. 10 on June 20, 2025. HISD admits that Senate Bill No. 10 will take effect on September 1, 2025. Otherwise, the allegations in Paragraph 37 do not relate to HISD and contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

38. The allegations in Paragraph 38 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

39. The allegations in Paragraph 39 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

40. The allegations in Paragraph 40 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

41. The allegations in Paragraph 41 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

42. The allegations in Paragraph 42 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

43. The allegations in Paragraph 43 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

44. The allegations in Paragraph 44 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

45. The allegations in Paragraph 45 contain legal conclusions that do not require a response. Additionally, the allegations in Paragraph 45 do not relate to HISD, and HISD lacks sufficient information to admit or deny them. Also, Senate Bill No. 10 and the legal opinions cited are the best evidence of their contents.

46. The allegations in Paragraph 46 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

47. The allegations in Paragraph 47 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

48. The allegations in Paragraph 48 contain legal conclusions that do not require a response. Additionally, the allegations in Paragraph 48 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

49. The allegations in Paragraph 49 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

50. The allegations in Paragraph 50 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

51. The allegations in Paragraph 51 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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56. The allegations in Paragraph 56 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

57. The allegations in Paragraph 57 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

58. The allegations in Paragraph 58 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

59. The allegations in Paragraph 59 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

60. The allegations in Paragraph 60 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

61. The allegations in Paragraph 61 contain legal conclusions that do not require a response.

62. The allegations in Paragraph 62 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

63. The allegations in Paragraph 63 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

64. The allegations in Paragraph 64 contain legal conclusions that do not require a response. Additionally, the statutes cited are the best evidence of their contents.

65. The allegations in Paragraph 65 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

66. The allegations in Paragraph 66 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

67. The allegations in Paragraph 67 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

68. The allegations in Paragraph 68 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

69. The allegations in Paragraph 69 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

70. The allegations in Paragraph 70 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

71. The allegations in Paragraph 71 contain legal conclusions that do not require a response. To the extent that a response is required, the allegations in Paragraph 71 do not relate to HISD, and HISD lacks sufficient information to admit or deny them. Additionally, the statute cited is the best evidence of its contents.

72. The allegations in Paragraph 72 contain legal conclusions that do not require a response. Additionally, Senate Bill No. 10 is the best evidence of its contents.

73. The allegations in Paragraph 73 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

74. The allegations in Paragraph 74 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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82. The allegations in Paragraph 82 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

83. The allegations in Paragraph 83 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

84. The allegations in Paragraph 84 contain legal conclusions that do not require a response. To the extent that a response is required, the allegations in Paragraph 84 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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181. The allegations in Paragraph 181 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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201. The allegations in Paragraph 201 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

202. The allegations in Paragraph 202 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

203. The allegations in Paragraph 203 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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205. The allegations in Paragraph 205 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

206. The allegations in Paragraph 206 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

207. The allegations in Paragraph 207 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

208. The allegations in Paragraph 208 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

209. The allegations in Paragraph 209 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

210. The allegations in Paragraph 210 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

211. The allegations in Paragraph 211 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

212. The allegations in Paragraph 212 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

213. The allegations in Paragraph 213 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

214. The allegations in Paragraph 214 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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219. The allegations in Paragraph 219 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

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221. The allegations in Paragraph 221 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

222. The allegations in Paragraph 222 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

223. The allegations in Paragraph 223 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

224. The allegations in Paragraph 224 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

225. The allegations in Paragraph 225 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

226. The allegations in Paragraph 226 do not relate to HISD, and HISD lacks sufficient information to admit or deny them.

227. HISD re-alleges and incorporates by reference all the above responses to Plaintiffs' allegations, as if fully set forth herein.

228. The allegations in Paragraph 228 contain legal conclusions that do not require a response.

229. The allegations in Paragraph 229 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

230. The allegations in Paragraph 230 contain legal conclusions that do not require a response.

231. The allegations in Paragraph 231 contain legal conclusions that do not require a response.

232. The allegations in Paragraph 232 contain legal conclusions that do not require a response. Additionally, the legal opinions cited are the best evidence of its contents.

233. The allegations in Paragraph 233 contain legal conclusions that do not require a response.

234. HISD denies that it has done anything to implement Senate Bill No. 10. Otherwise, the allegations in Paragraph 234 contain legal conclusions that do not require a response.

235. The allegations in Paragraph 235 contain legal conclusions that do not require a response.

236. HISD re-alleges and incorporates by reference all the above responses to Plaintiffs' allegations, as if fully set forth herein.

237. The allegations in Paragraph 237 contain legal conclusions that do not require a response.

238. The allegations in Paragraph 238 contain legal conclusions that do not require a response.

239. The allegations in Paragraph 239 contain legal conclusions that do not require a response.

240. The allegations in Paragraph 240 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

241. The allegations in Paragraph 241 contain legal conclusions that do not require a response. Additionally, the legal opinion cited is the best evidence of its contents.

242. The allegations in Paragraph 242 contain legal conclusions that do not require a response.

243. HISD denies that it has done anything to administer or implement Senate Bill No. 10. Otherwise, the allegations in Paragraph 243 contain legal conclusions that do not require a response.

244. The allegations in Paragraph 244 contain legal conclusions that do not require a response.

HISD admits that Plaintiffs seek the relief identified in the unnumbered paragraph entitled “Request for Relief,” but denies that it is liable to the Plaintiffs for any of the relief requested. Additionally, any allegations contained in unnumbered paragraphs, footnotes, or that are not explicitly admitted herein, are denied.

#### **AFFIRMATIVE AND OTHER DEFENSES**

In asserting the following defenses, HISD does not admit to having the burden of proving the allegations or denials contained therein, but instead asserts that the Plaintiffs bear the burden of proving the facts relevant to many of the defenses and the burden of proving the inverse of the allegations contained in many of the defenses. Moreover, by asserting any defense, HISD does not admit any liability, but, to the contrary, specifically denies any and all allegations of liability in Plaintiffs’ lawsuit. Without admitting liability as to any of Plaintiffs’ causes of action, HISD asserts the following defenses:

1. The Court lacks subject-matter jurisdiction over Plaintiffs’ claims against HISD because they lack standing. Plaintiffs’ alleged injuries are hypothetical and speculative, and they are neither fairly traceable to—nor redressable by—HISD.

2. The Court lacks subject-matter jurisdiction over Plaintiffs’ claims against HISD because such claims are not ripe. Plaintiffs’ claims are contingent on future events that may not occur as anticipated or may not occur at all.

3. Plaintiffs' claims are barred, in whole or in part, because HISD is not a proper party to this lawsuit.

4. Plaintiffs' claims are barred, in whole or in part, because HISD cannot be held liable under 42 U.S.C. § 1983 for complying with state law mandates.

**CONCLUSION AND REQUEST FOR RELIEF**

Defendant Houston Independent School District requests that Plaintiffs take nothing on their claims. HISD also requests all such other and further relief to which it may be entitled, at law in or in equity.

Respectfully submitted,

**BUTLER SNOW LLP**

By: /s/ Eric J.R. Nichols  
Eric J.R. Nichols  
State Bar No. 14994900  
[Eric.Nichols@butlersnow.com](mailto:Eric.Nichols@butlersnow.com)  
J.R. Johnson  
Texas Bar No. 24070000  
[JR.Johnson@butlersnow.com](mailto:JR.Johnson@butlersnow.com)  
1400 Lavaca Street, Suite 1000  
Austin, Texas 78701  
Tel: (737) 802-1800  
Fax: (737) 802-1801

**ATTORNEYS FOR DEFENDANT  
HOUSTON INDEPENDENT SCHOOL  
DISTRICT**

**CERTIFICATE OF SERVICE**

I certify that on August 28, 2025, a true and correct copy of the foregoing document was served on all counsel of record by filing with the Court's CM/ECF system.

/s/ Eric J.R. Nichols  
Eric J.R. Nichols